

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>SPECTRUM</b>	§
<b>LABORATORIES, LLC.,</b>	§
an Ohio Limited Liability	§ CIVIL ACTION NO.
Company,	§ <b><u>4:22-CV-03705</u></b>
Plaintiff,	§ § § §
vs.	§ JUDGE CHARLES ESKRIDGE
§ § §	§ § §
<b>DOES #1-10,</b>	§
Defendants.	§

**SPECTRUM'S PROPOSED ORDER GRANTING  
SPECTRUM'S MOTION FOR SANCTIONS**

In accordance with the Court's February 13, 2024 Order (Dkt. 97), Plaintiff Spectrum Laboratories, LLC provides the attached proposed order, **Exhibit 1**, substantially in the form previously submitted by Spectrum Laboratories as Dkt 83-6 at 13, points 1-4, 7. As ordered by the Court, Spectrum has noted disagreements by URZ. Spectrum asked URZ to provide written redlines or comments to Spectrum's proposed order before they conferred by phone. URZ refused, would only dictate its disagreements orally over the phone on February 27, and demanded that Spectrum type out URZ's disagreements itself in this filing, which Spectrum has done.

DATED: February 28, 2024

Respectfully submitted,

By: /s/ Matthew J. Cavanagh

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## **CERTIFICATE OF SERVICE**

Service of this document on counsel of record was accomplished automatically through the Court's Notice of Electronic Filing on February 28, 2024.

/s/ Courtney Ervin  
Courtney Ervin